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Attorney(s) for the County of Marin,

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

KARL FINLEY,

Plaintiff,

v.

COUNTY OF MARIN; MARSHA GRANT;

DIANE STOKER; and DOES 1 through 50,

Defendants.

Case No.: USDC 07 5922 TEH

STIPULATION TO POSTPONE DEADLINE
FOR AN EARLY NEUTRAL EVALUATION
(ENE) AND [PROPOSED] ORDER

Counsel for Defendant, Marin County, and Plaintiff, Karl Finley, hereby submits this stipulation to postpone the deadline for an early neutral evaluation in the above-referenced case. Grounds for a continuance are as follows:

- 1) The current deadline to complete an early neutral evaluation is June 30, 2008. Accordingly, the parties agreed to have such an evaluation done by Sandra McCandles on June 11, 2008.
- 2) However, Counsel for Plaintiff determined that he or his firm was opposing counsel in another case with Ms. McCandles' firm. When informed of this potential conflict, Ms. McCandles determined it would be best for her to recuse herself and did so.
- 3) When informed of Ms. McCandle's recusal, Claudia Forehand, ADR Case Administrator, indicated that she would assign another evaluator as soon as possible and requested that counsel for the parties agree to a stipulation requesting an order from the court postponing the deadline to complete an ENE.

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3 Dated: June 24, 2008

4 PATRICK K. FAULKNER
5 COUNTY COUNSEL

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7 By: _____/s/_____
8 Edward J. Kiernan
9 Deputy County Counsel
10 Attorney for Defendant County of Marin

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12 By: _____/s/_____
13 David M. Poore
14 Kahn, Brown & Poore
15 Attorney for Plaintiff Karl Finley
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